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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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December 20, 2002

Mr. Joel B. Hebdon, Director  
United States Department of Energy  
P.O. Box 550, MSIN: A5-15  
Richland, Washington 99352

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Dear Mr. Hebdon:

**Re: Hanford Facility Dangerous Waste Part A Permit Application, Form 3, for the 1706-KE Waste Treatment System, Revision 4 (TSD: T-1-3)**

- References:**
- (1) Letter, Michael A. Wilson, Ecology, from Joel Hebdon, USDOE, "Hanford Facility Dangerous Waste Part A Permit Application, Form 3, for the 1706-KE Waste Treatment System, Revision 4 (TSD: T-1-3)", dated October 10, 2001, (02-RCA-0594)
  - (2) Letter, Joel B. Hebdon, USDOE, from John Price, Ecology, and Larry Gadbois, EPA, dated May 14, 2002
  - (3) Letter, John Price, Ecology, from Joel Hebdon, USDOE, "Integrated Closure for the 1706-KE Waste Treatment System", dated May 06, 2001, (02-RCA-0328)
  - (4) "Coordination Between RCRA Corrective Action and Closure and CERCLA Site Activities", EPA, September 24, 1996
  - (5) "200 Areas Remedial Investigation/Feasibility Study Implementation Plan", (DOE/RL-98-28)

The Washington State Department of Ecology (Ecology) has received and reviewed the United States Department of Energy's (USDOE's) Hanford Facility Dangerous Waste Part A Permit Application, Form 3, for the 1706-KE Waste Treatment System, Revision 4 (TSD: T-1-3) (Reference 1). Ecology denies Revision 4 and the pending Revision 3 is also denied. Ecology is providing this letter to clarify the permit requirements for the 1706-KE Treatment, Storage, and Disposal (TSD) unit.

Resource Conservation and Recovery Act (RCRA) regulated units are subject to specific standards for operation, characterization of releases, groundwater corrective action and closure as stated in the Environmental Protection Agency (EPA) memorandum, "Coordination between

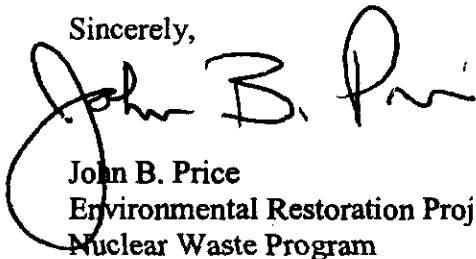
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RCRA Corrective Action and Closure and CERCLA Sites Activities", (References 3 and 4). While Ecology and EPA support integrated closure of the unit (Reference 3), it is not the intent of Ecology to circumvent regulatory requirements outlined in the 100 Area Remaining Sites Record of Decision or Washington Administrative Code, Chapter 173-303. The 200 Area Implementation Plan also outlines a structure for integrating RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activities (Reference 5).

Closure documentation for the 1706-KE unit will need to be provided to Ecology. This information maybe extracted from the provided CERCLA documentation. It is not required that this documentation be in the form of a formal "stand alone" closure plan. Additionally, the submitted Part A, Revision 4, cites information referenced in the unapproved, pending Part A, Revision 3. There are significant differences in text and process design capacity/description. The current Part A, Revision 4, requires re-submittal to reflect the most accurate state of the TSD unit, including only those remaining portions subject to RCRA regulation. Text should not indicate this unit original intent was to manage waste as proposed in the pending Revision 3.

Should you have any questions regarding this letter, please feel free to contact me at (509) 736-3029, or Bob Wilson at (509) 736-3031.

Sincerely,



John B. Price  
Environmental Restoration Project Manager  
Nuclear Waste Program

JV:sb

cc: Dave Bartus, EPA  
Larry Gadbois, EPA  
Ellen Mattlin, USDOE  
Chris Smith, USDOE  
J.V. Borghese, BHI  
Roger Bowman, BHI  
Donna Yasek, BHI  
Suzette Thompson, FH  
Armand Minthorn, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YN  
Ken Niles, OOE  
Administrative Record: HSWP, 1706-KE, and 100-KR-2